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Attorney for Plaintiffs

The Honorable James L. Robart

UNITED STATES DISTRICT COURT OF THE WESTERN
DISTRICT OF WASHINGTON AT SEATTLE

CAROLINE ANGULO, a single person, ERIC
KELLER, a single person, and ISABEL
LINDSEY and CHARLES LINDSEY, a
married couple,

Plaintiffs.

v.

PROVIDENCE HEALTH & SERVICES
WASHINGTON, a non-profit Washington
Corporation, also d/b/a PROVIDENCE ST.
MARY MEDICAL CENTER; Dr. JASON A.
DREYER, DO, and JANE DOE DREYER,
husband and wife and the marital community
thereof; Dr. DANIEL ELSKENS DO, and
JANE DOE ELSKENS, husband and wife and
the marital community thereof; and
JOHN/JANE DOES 1-10, and any marital
communities thereof,

Defendants.

NO. 22-CV-00915-JLR

**ERRATA RE SECOND AMENDED
COMPLAINT**

1 On April 7, 2023, Plaintiffs filed their Motion to Amend the Complaint and their proposed
2 Second Amended Complaint was attached as Exhibit A to the Motion for review of the court, with
3 the complaint's exhibits attached, per local rule.

4 By order dated Monday, May 8, 2023, the Court granted this Motion and instructed
5 Plaintiffs to file and serve the proposed Second Amended Complaint.

6 After this Order, but before filing and serving the Second Amended Complaint, Plaintiffs'
7 Counsel noticed that Exhibits 3 and 4, though referenced in the body of the new complaint, were
8 inadvertently omitted from the Second Amended Complaint as proposed to this Court in its Motion
9 to Amend. These two exhibits were included as exhibits in the first Amended Complaint, and so
10 are not new material.

11 Plaintiffs alerted the other parties to this inadvertent omission from the proposed Second
12 Amended Complaint, and no party had an objection to Plaintiffs correcting the Second Amended
13 Complaint by adding Exhibits 3 and 4 at the time of filing the Second Amended Complaint. Thus,
14 the Plaintiffs have filed the Second Amended Complaint with all correct exhibits attached.

15 DATED THIS 17th day of May, 2023

16 Respectfully Submitted,

17 GILBERT LAW FIRM, P.S.
Attorneys for Plaintiffs

18 By s/
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CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury under the laws of the state of Washington, that I am now, and at all times material hereto, a citizen of the United States, a resident of the state of Washington, over the age of 18 years, not a party to, nor interested in the above-entitled action, and competent to be a witness herein. I caused to be served on this date the foregoing document in the manner indicated to the parties listed below:

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DATED this 17th day of May 2023.



RACHEL COOK, Paralegal